

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Tracey Martin

Debtor(s)

CHAPTER 13

Nationstar Mortgage LLC

Movant

NO. 23-13538 AMC

vs.

Tracey Martin

Debtor(s)

Kenneth E. West

Trustee

11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. This stipulation is here to resolve the Movant's Objection to the Debtor's Chapter 13 Plan, Doc no. 25 with a hearing date scheduled for July 18, 2024.

2. Debtor shall obtain a loan modification agreement with the Movant by August 31, 2024, or as may be extended by modified plan.

3. Debtor is to make regular post-petition payments in accordance with the terms of the Note and Mortgage and applicable payment change notices while the loan modification is pending.

4. The Chapter 13 Trustee is not to pay the arrears while the loan modification is pending;

5. Movant does not waive its rights to the pre-petition arrears or any post-petition arrears that may accrue during the loan modification process.

6. In the event the loan modification is not successful, Debtor shall file an amended Chapter 13 to otherwise address the Movant's claim.

7. Movant reserves the right to object to any Amended Chapter 13 Plan.

8. Movant may file a Certification of Default if Debtor's Amended Chapter 13 Plan is not filed by September 15, 2024, or within 30 days of the denial letter for the modification.

9. The terms of this stipulation conflicts with the Chapter 13 plan, this stipulation is to take precedent over the plan.

10. This stipulation hereby resolves the Movant's Objection to the Debtor's Chapter 13 Plan.

11. The parties agree that a facsimile signature shall be considered an original signature.

Date: July 15, 2024

/s/ Denise Carlon, Esquire

Denise Carlon, Esquire
Attorney for Movant

Date: July 16, 2024

/s/ Brenna Hope Mendelsohn

Brenna Hope Mendelsohn Esq.
Attorney for Debtor(s)

Date: July 18, 2024

No Objection - Without Prejudice to Any Trustee
Rights or Remedies

/s/ LeeAne O. Huggins

Kenneth E. West, Esquire
Chapter 13 Trustee

Approved by the Court this ____ day of _____, 2024. However, the court
retains discretion regarding entry of any further order.

Bankruptcy Judge
Ashely M. Chan